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15 **UNITED STATES BANKRUPTCY COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

17 In re:

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC COMPANY,**

21 **Debtors.**

- 22 ☐ Affects PG&E Corporation  
23 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

24 *\* All papers shall be filed in the Lead Case,*  
25 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**SECOND STIPULATION BY AND  
BETWEEN REORGANIZED  
DEBTORS AND CAL FIRE  
REGARDING DEADLINE FOR  
REORGANIZED DEBTORS TO  
OBJECT TO CLAIMS**

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the  
3 Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**  
4 **11 Cases**”), on the one hand, and the California Department of Forestry and Fire Protection,  
5 (“**CAL FIRE**,” and together with the Debtors and the Reorganized Debtors, the “**Parties**”), on  
6 the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On January 29, 2019, the Debtors commenced these Chapter 11 Cases in the United  
9 States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The  
10 Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule  
11 1015(b) of the Federal Rules of Bankruptcy Procedure.

12 B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the  
13 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*  
14 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from  
15 time to time, and together with any exhibits or schedules thereto, the “**Plan**”).<sup>1</sup> The Effective Date  
16 of the Plan occurred on July 1, 2020. *See* Dkt. No. 8252. Pursuant to Section 7.1 of the Plan (as  
17 approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to  
18 Claims until the later of (i) one hundred and eighty (180) days after the Effective Date (i.e.,  
19 December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause  
20 shown. Plan § 7.1.

21 C. On October 27, 2020, the Reorganized Debtors filed the *Motion for Entry of an*  
22 *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9355],  
23 which the Court granted with certain limited modifications in the *Order Extending Deadline for*  
24 *the Reorganized Debtors to Object to Claims* [Dkt. No. 9563] (the “**First Extension Order**”).  
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27 <sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the  
28 Plan or Confirmation Order.

1 The First Extension Order extended the Reorganized Debtors' deadline under Section 7.1 of the Plan  
2 to object to Claims by one hundred eighty (180) days, through and including June 26, 2021.

3 D. On March 17, 2021, the Reorganized Debtors filed the *Motion for Entry of an Order*  
4 *Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*  
5 [Dkt. No. 10409], which the Court granted, with modifications, in the *Order Further Extending*  
6 *Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No.  
7 10494] (the "**Second Extension Order**"). The Second Extension Order further extended the  
8 Reorganized Debtors' deadline under Section 7.1 of the Plan to object to Claims by one hundred  
9 eighty (180) days, through and including December 23, 2021, except that the deadline for the  
10 Reorganized Debtors to object to CAL FIRE Claims was extended through and including September  
11 30, 2021, without prejudice to the right of the Reorganized Debtors to move for further extensions of  
12 all such dates. (As used here, "**CAL FIRE Claims**" means Class 4B Utility General Unsecured  
13 Claims of CAL FIRE enumerated in the *Limited Objection of California Department of Forestry and*  
14 *Fire Protection to Motion for Entry of an Order Further Extending Deadline for the Reorganized*  
15 *Debtors to Object to Claims and for Related Relief* [Docket No. 10480].)

16 E. On September 24, 2021, the Parties filed a *Stipulation by and Between Reorganized*  
17 *Debtors and Cal Fire Regarding Deadline for Reorganized Debtors to Object to Claims* [Dkt. No.  
18 11322] (the "**First Stipulation**"), which the Court approved on September 28, 2021 [Dkt. No.  
19 11336]. The First Stipulation noted that the Parties had resolved 14 CAL FIRE Claims and  
20 provided, as to the remaining two CAL FIRE claims, that the objection deadline for CAL FIRE  
21 Claim No. 79338 would be extended to November 15, 2021, and the objection deadline for CAL  
22 FIRE Claim No. 65505 would be extended to December 23, 2021 (the "**Stipulated Deadlines**").

23 F. On November 4, 2021, the Court issued an *Order Further Extending Deadline for the*  
24 *Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 11533] (the "**Third**  
25 **Extension Order**"). The Third Extension Order further extended the Reorganized Debtors'  
26 deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180) days, through  
27 and including June 21, 2022, without prejudice to the right of the Reorganized Debtors to seek  
28 additional extensions thereof, but expressly left the Stipulated Deadlines unchanged.

1 G. The Parties are near resolution of CAL FIRE Claims No. 79338 and 65505, and  
2 believe that it will be mutually beneficial to modify the Stipulated Deadlines, as set forth below.

3 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
4 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
5 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
6 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
7 **TO ORDER, THAT:**

8 1. The objection deadline for CAL FIRE Claim No. 79338 shall be November 19, 2021.

9 2. The objection deadline for CAL FIRE Claim No. 65505 shall remain December 23,  
10 2021.

11 3. This Stipulation shall constitute the entire agreement and understanding of the Parties  
12 relating to the subject matter hereof and shall supersede all prior agreements and understandings  
13 relating to the subject matter hereof.

14 4. This Stipulation may be executed in counterparts, each of which shall be deemed an  
15 original, but all of which together shall constitute one and the same agreement.

16 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
17 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

18 Dated: November 12, 2021

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